

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: § Chapter 11  
§  
ALPINE SUMMIT ENERGY § Case No. 23-90739 (DRJ)  
PARTNERS, INC., *et al* §  
§ (Joint Administration Requested)  
Debtors<sup>1</sup>.

**NOTICE OF APPEARANCE OF COUNSEL AND REQUEST FOR NOTICES**

Please take notice that Michael C. Sanders, attorney on behalf of Paleo Oil Company, LLC (“Paleo”), hereby submits this notice of appearance as counsel in the above-styled and numbered case and requests notice of all hearings and conferences herein and makes a demand for service of all papers herein, including all papers and notices pursuant to Rules 2002, 3011, 3017, 5009, 9007 and 9010 (if applicable) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and §§ 342 and 1109(b) (if applicable) of title 11 of the U.S. Code (the “Bankruptcy Code”).

All notices given or required to be given in this case shall be served as follows:

Michael C. Sanders  
Sanders PLLC  
5850 San Felipe, Suite 500  
Houston, TX 77057  
eservice@sandersfirm.law  
Telephone: 713-338-2677  
Fax: 713-347-9569

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification number, are Alpine Summit Energy Partners, Inc. (3755), HB2 Origination, LLC (6760), Ageron Energy II, LLC (1436), Ironroc Energy Partners LLC (9801), Ageron Ironroc Energy, LLC (N/A), Alpine Summit Energy Investors, Inc. (4428), and Alpine Carbon, LLC (N/A). The location of the Debtors’ service address is: 3322 West End Ave, Suite 450, Nashville, TN 37203.

operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, discovery request, deposition notice, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any proceeding related thereto.

PLEASE TAKE FURTHER NOTICE that Paleo intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive *(i)* the right of Paleo to object and/or not consent to entry of final orders by a Bankruptcy Judge in non-core matters and request that final orders in non-core matters be entered only after de novo review by a District Judge; *(ii)* the right of Paleo to a trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case; *(iii)* the right of Paleo to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or, *(iv)* any other rights, claims action, defenses, setoffs, or recoupments to which Paleo is or may be entitled under agreements, at law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments the undersigned expressly reserves on behalf of Paleo.

Dated: July 6, 2023

Respectfully Submitted,

SANDERS PLLC

By: /s/ Michael C. Sanders  
Michael C. Sanders  
Texas Bar No. 24007981  
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ATTORNEY FOR PALEO OIL COMPANY, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on July 6, 2023, a true and correct copy of the foregoing instrument was served, in accordance with the Federal Rules of Bankruptcy Procedure, via email on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system, including the debtor's counsel, the trustee's counsel, the United States Trustee, and all parties requesting notice.

/s/ Michael C. Sanders  
Michael C. Sanders